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From:LEWIS BRISBOIS BISGAARD &amp; SMITH LLP

T-086 P.004/006 F-801

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AND CASUALTY INSURANCE COMPANY

## UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA (San Francisco)

CHRISTINE DOUGHERTY,

Plaintiff,

v.

AMCO INSURANCE COMPANY, and DOES  
ONE through TWENTY, Inclusive,

Defendant.

CASE NO. C 07-01140 MHP  
E-FILINGSTIPULATION AND PROPOSED ORDER  
RE EXTENDING DEADLINE FOR  
COMPLETING LIMITED DISCOVERY  
PRIOR TO MOTION FOR SUMMARY  
JUDGMENTAction Filed: 1/24/07  
Removed to USDC: 2/26/07

Plaintiff CHRISTINE DOUGHERTY and Defendant AMCO INSURANCE COMPANY,  
by and through their undersigned counsel, hereby jointly stipulate to and request the Court agree to  
continue the deadlines for completion of discovery for the purpose of motions for summary  
judgment and for filing motions for summary judgment.

The parties attended a Status Conference on November 5, 2007, and the Court  
subsequently issued a Minute Order. On January 24, 2008, this Court issued an Order  
memorializing its Minute Order, as follows:

///

4813-2082-5794.1

CERTIFICATE OF SERVICE  
C07-01140 MHP

1 • Last Day for Completion of Discovery for the  
2 Purpose of Motions for Summary Judgment

February 4, 2008

3 • Last Day to File Motions for Summary Judgment

March 10, 2008

4 (See Court's Order dated January 24, 2008, attached hereto as Exhibit "A.").

5 Pursuant to the Court's Minute Order, on January 4, 2008 Plaintiff served on AMCO by  
6 mail a notice of taking deposition of AMCO's person most knowledgeable on nine different  
7 topics. AMCO's counsel has attempted to locate and identify the witnesses who qualify as the  
8 person most knowledgeable on these topics, including those related to the Colossus program, but  
9 has experienced some difficulty in locating all of the witnesses to produce for deposition. Part of  
10 the delay has been caused by the circumstance that AMCO and its related companies stopped  
11 using the Colossus program in August of 2005, and thus locating any related documents and  
12 identifying the individuals still employed by AMCO who have significant knowledge of the  
13 Colossus program has been difficult and has taken longer than anticipated.

14 That search was just recently completed and the witness with regard to the Colossus  
15 program who was identified is located out of state. AMCO expects to be in a position to produce  
16 for deposition that witness, as well as the witnesses responsive to the other identified topics, in the  
17 next three weeks.

18 Therefore, given the efforts of AMCO to identify and locate the witnesses appropriate to  
19 produce in response to Plaintiff's notice of taking deposition, and the delay in completing that  
20 effort until recently, the parties jointly stipulate and request the Court to continue the deadlines for  
21 completion of discovery for the purpose of motions for summary judgment and for filing motions  
22 for summary judgment.

23 Therefore, the parties agree and stipulate to the following, subject to the Court's approval:

24 1. The deadlines for completion of discovery for the purpose of motions for summary  
25 judgment and for filing motions for summary judgment, as set forth in this Court's Order dated  
26 January 24, 2008, is vacated.

27 2. The deadline for completion of discovery for the purpose of motions for summary  
28 judgment is set for March 10, 2008.

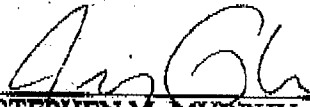
3. The deadline for filing motions for summary judgment is set for March 24, 2008.

Respectfully submitted,

DATED: February 13, 2008

LAW OFFICES OF STEPHEN M. MURPHY

By

  
STEPHEN M. MURPHY  
JEREMY A. GRAHAM  
Attorneys for Plaintiff  
CHRISTINE DOUGHERTY

DATED: February \_\_, 2008

LEWIS BRISBOIS BISGAARD & SMITH LLP

By

JULIAN J. PARDINI  
Attorneys for Defendant  
AMCO INSURANCE COMPANY

**ORDER**

Pursuant to the above stipulated request of the parties for an order continuing certain discovery deadlines,

**IT IS HEREBY ORDERED that:**

1. The deadlines for completion of discovery for the purpose of motions for summary judgment and for filing motions for summary judgment, as set forth in this Court's Order dated January 24, 2008, is vacated.

2. The deadline for completion of discovery for the purpose of motions for summary judgment is set for March 10, 2008.

3. The deadline for filing motions for summary judgment is set for March 24, 2008.

DATED: February \_\_, 2008

HONORABLE MARILYN H. PATEL  
UNITED STATES DISTRICT COURT JUDGE